

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Plaintiff(s)	:	
	:	
Merche Banks	:	
	:	
vs.	:	Civil Action No.
	:	
Defendant(s)	:	
	:	
Harry M. White, Greyhound Lines, Inc. and	:	
John Doe	:	

NOTICE TO PLAINTIFF

TO: Michael A. Snover, Esq.
ATTORNEY AT LAW
2571 Baglyos Circle, Suite 25
Bethlehem, PA 18020

PLEASE TAKE NOTICE that defendants, Harry White and Greyhound Lines, Inc., have filed a Petition in the Eastern District of Pennsylvania for the removal of an action now pending in the Court of Common Pleas of Philadelphia County, entitled, Merche Banks v. Harry White, et al, No. C-48-CV-2022-4965.

FURTHER TAKE NOTICE that petitioners, Harry White and Greyhound Lines, Inc., have at the same time filed with the United States District Court for the Eastern District of Pennsylvania, a copy of the Complaint served upon it, which was filed and entered in the Court of Common Pleas of Philadelphia County.

A copy of said Petition for Removal is attached to this Notice and is hereby served upon you.

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By:  _____

JUSTIN A. BAYER, ESQUIRE

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PA 93546

Attorney for Defendants, *Harry White and Greyhound Lines, Inc.*

Date: September 1, 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Plaintiff(s)	:	
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Merche Banks	:	
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vs.	:	Civil Action No.
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Defendant(s)	:	
	:	
Harry M. White, Greyhound Lines, Inc. and	:	
John Doe	:	

**DEFENDANTS HARRY WHITE AND GREYHOUND LINES, INC.’S
NOTICE OF REMOVAL**

Defendants, Harry White and Greyhound Lines, Inc., through their undersigned attorneys, gives notice of the removal of the above captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Northampton County, Pennsylvania, and in support thereof aver as follows:

1. A civil action has been brought against defendants by the plaintiff in the Court of Common Pleas of Northampton County at No. C-48-CV-2022-4965. A copy of that Complaint is attached hereto as Exhibit “A”.

2. This is an action over which the Court has original jurisdiction pursuant to 28 U.S.C. § 1332, because it is a civil action between citizens of different states and exceeds the required amount in controversy, exclusive of interest and costs pursuant to 28 U.S.C. § 1332.

2. The State Court where the action was originally filed is located in Northampton County, Pennsylvania, which is embraced within this judicial district.

3. The plaintiff is, at the time of the filing of this action, a citizen of the State of New York. Ex. A. at ¶1.

4. Defendant Harry White is, at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania, Ex A. at ¶2.

5. Defendant Greyhound Lines, Inc. is a Delaware corporation with corporate headquarters located at 2221 E. Lamar Blvd., Suite 500, Arlington, Texas.

5. In her Complaint, Plaintiff alleges she suffered serious bodily injuries to her neck, back, both arms, both hips, both thighs, both lower legs, and discs. Plaintiff also alleges she suffered great mental and physical anguish and pain and will continue to suffer pain in the future. She alleges substantial past and future medical expenses and lost past wages and lost future employment benefits and employment opportunities. Plaintiff also alleges loss of everyday pleasures and enjoyment of life, loss of life expectancy, loss of happiness, and loss of pleasures of life. See Exhibit A at ¶¶ 9-18. As such, his action is for an amount in controversy in excess of statutory jurisdictional limit of \$75,000, together with costs of this action and damages for delay.

7. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted:

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: 

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Attorney for Defendants, *Harry White and Greyhound Lines, Inc.*

Date: September 1, 2022